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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
AT SAN FRANCISCO**

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO,  
et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF  
PERSONNEL MANAGEMENT, et al.,

Defendants.

NO. 3:25-cv-01780-WHA

[PROPOSED] ORDER GRANTING  
PLAINTIFF STATE OF  
WASHINGTON'S MOTION FOR  
PRELIMINARY INJUNCTION

APRIL 9, 2025, 8:00 AM

The State of Washington's motion for a preliminary injunction came before this Court for consideration on \_\_\_\_\_, 2025. Upon consideration, and for good cause shown, IT IS HEREBY ORDERED that the motion is GRANTED.

This Court has subject matter jurisdiction to hear the State of Washington's claims, because the State has demonstrated Article III standing. The Court finds that the State of

1 Washington has demonstrated a likelihood of success on the merits of its claims, a likelihood of  
 2 irreparable harm in the absence of preliminary injunctive relief, that the balance of equities tips  
 3 in the State's favor, and that the public interest favors preliminary injunctive relief.

4 Accordingly, IT IS HEREBY ORDERED that the relief this Court previously awarded  
 5 to organizational Plaintiffs in its amended Temporary Restraining Order dated March 13, 2025,  
 6 Dkt. No. 44, and in its oral and written decisions granting preliminary injunctive relief, Dkt. Nos.  
 7 120, 132, extends to the State of Washington.

8 It is FURTHER ORDERED that relief Defendants the Department of Agriculture, the  
 9 Department of Commerce, the Department of Defense, the Department of Education, the  
 10 Department of Health and Human Services, the Department of Homeland Security, the  
 11 Department of Housing and Urban Development, and the Department of the Interior shall  
 12 comply with all provisions of this Order, including immediately offering reinstatement to any  
 13 and all probationary employees terminated on or about February 13th and 14th, 2025, ceasing  
 14 any and all use of the template termination notice provided by Defendant OPM and/or  
 15 Acting Director Ezell on or about February 13 and 14, 2025, immediately advising all  
 16 probationary employees terminated on or about February 13 and 14, 2025, that the notice and  
 17 termination has been found to be unlawful by the United States District Court for the  
 18 Northern District of California, and ceasing any termination of probationary employees at the  
 19 direction of defendants OPM and Acting Director Ezell. Any terminations of these agencies'  
 20 employees may only be made by the agencies themselves in conformity with the Civil Service  
 21 Reform Act and the Reduction in Force Act and any other Constitutional or statutory  
 22 requirement. In seven calendar days, relief Defendants Department of Commerce, Department of  
 23

1 Education, Department of Health and Human Services, Department of Homeland Security, and  
2 Department of Housing and Urban Development shall submit a list of all probationary employees  
3 terminated on or about February 13 or 14, 2025, with an explanation as to each of what has been  
4 done to comply with this Order.

5 This Order does not supersede any reporting or compliance required by any other order  
6 of this Court.

7 IT IS SO ORDERED.

8 DATED this \_\_\_\_ day of \_\_\_\_\_ 2025.

9  
10  
11 \_\_\_\_\_  
HONORABLE WILLIAM ALSUP  
United States District Judge

12 Presented by:

13 NICHOLAS W. BROWN  
14 Attorney General

15 /s/ Cynthia L. Alexander  
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